



Racing Integrity
Commissioner

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Commissioner

Annual Report 2017–18



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Letter to the Minister

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The Hon. Martin Pakula MP
Minister for Racing
Level 26, 121 Exhibition Street
Melbourne Vic 3000

Dear Minister,

I am pleased to present to you my Annual Report for the year ending 30 June 2018 for presentation to Parliament, in accordance with section 37F(1) of the *Racing Act 1958*.

This report documents the performance of my functions, exercise of my powers and integrity related issues determined to be in the public interest.

Yours sincerely,



Sal Perna
Racing Integrity Commissioner

Vision, Mission, Strategic Objectives and Values

Our Vision

A Victorian Racing Industry in which Thoroughbreds, Standardbreds and Greyhounds compete to the best of their natural ability, free from the influence of crime and corruption.

Our Mission

To promote the highest standards of integrity assurance in the Victorian Racing Industry.

Our Strategic Objectives

- Enhance public confidence in the integrity of Victorian racing.
- Develop leadership in racing integrity assurance.
- Enhance existing racing integrity assurance processes and systems.

Our Values

Integrity —

We will be accountable, fair and transparent.

Independence —

We will act impartially, without fear or favour.

Leadership —

We are committed to being at the forefront of integrity assurance.

Professionalism —

We are dedicated to achieving excellence.

Engagement —

We will develop successful partnerships built on trust.

The *Racing Act 1958* (Vic) (Racing Act) establishes the statutory position of Racing Integrity Commissioner (Commissioner).

Mr Sal Perna was appointed to the role of Commissioner on 1 March 2010. The Governor in Council has since extended Mr Perna's appointment on three consecutive occasions, with the current term of appointment extending to 2019.

The Commissioner's role is to provide independent oversight of integrity related matters across the Victorian Thoroughbred, Harness and Greyhound racing codes, including the three controlling bodies that regulate each respective code: Racing Victoria (RV), Harness Racing Victoria (HRV) and Greyhound Racing Victoria (GRV).

Our operations

The Racing Act guides the operations of the Office of the Racing Integrity Commissioner. The Commissioner's key functions are set out in section 37B of the Racing Act and include to:

- **conduct audits**, including annual audits, of the internal integrity processes and systems of each controlling body, as well as additional audits at the request of a controlling body
- **conduct own motion inquiries** that do not relate to a specific complaint, but are related to the integrity of the Victorian Racing Industry (VRI) and may include an investigation into systematic issues in racing
- **investigate complaints** about the integrity processes and systems of each controlling body, as well as matters referred by the Minister for Racing (Minister) or a controlling body
- **refer complaints**, as appropriate, to specified persons and bodies
- **report the findings** of investigations into non-referred complaints to the complainant and the Minister or the relevant controlling body
- **make recommendations** (if appropriate) to the Minister or the relevant controlling body following the investigation of any complaint, inquiry or matter
- **direct a Racing Appeals and Disciplinary Board** (RADB) to hear and determine an appeal against a penalty imposed in certain circumstances
- **conduct audits** of the internal animal welfare processes and systems of each controlling body to the extent that they relate to integrity in racing
- **refer complaints** to the relevant government agency if the complaint relates to the animal welfare processes and systems of a controlling body.

The Commissioner's powers are set out in section 37C of the Racing Act, and include the power to do all things necessary or convenient for the performance of his functions. Additionally, under the Racing Act, the Commissioner may:

- **use additional powers** while conducting certain investigations or inquiries, such as summons and examine specified classes of persons, in accordance with section 37BA. These powers are sometimes referred to as 'Board of Inquiry' powers
- **disclose integrity** related information, as appropriate, to specified persons and bodies in accordance with section 37E.

Detailed information about the Commissioner's functions and powers can be found in Part 1A of the Racing Act, available at www.legislation.vic.gov.au.

The Commissioner is supported by employees of the Department of Justice and Regulation, who enable the Commissioner to perform his functions and exercise his powers. Together, the Commissioner and his office are referred to as the Office of the Racing Integrity Commissioner (ORIC). All employees report directly to the Commissioner in relation to their specific areas.

The key responsibilities of the team include:

- investigating complaints and information
- managing the systems and processes for the collection, collation, analysis and dissemination of intelligence and information
- producing intelligence reports and presentations on findings of information and data analysis
- managing and maintaining the case management system
- office operations (i.e. finance, human resources, procurement etc.)
- business continuity planning
- risk management and compliance
- conducting audits
- developing training programs
- project management
- policy development
- strategic and business planning
- annual reports.

Annual declarations

Staff complete annual declarations and adhere to the 'no betting policy' throughout their employment. The Commissioner personally reviewed all staff declarations completed in the 2017–18 reporting period.

Privacy and data protection

Compliance with the Protected Disclosures Act

The *Protected Disclosures Act 2012* encourages and assists people in making disclosures of improper conduct by public officers and public bodies. The Protected Disclosures Act provides protection to people who make disclosures in accordance with its provisions. It establishes a system for the matters disclosed to be investigated and rectifying action to be taken.

Reporting procedures

ORIC is not empowered by legislation to receive disclosures under the Protected Disclosures Act. Disclosures of improper conduct or detrimental action by the Commissioner or employees of ORIC may be made directly to the Independent Broad-based Anti-corruption Commission (IBAC):

Independent Broad-based Anti-corruption Commission
Level 1, 459 Collins Street (North Tower)
Melbourne Vic 3000
Toll free: 1300 735 135
Website: www.ibac.vic.gov.au

Alternatively, disclosures of improper conduct or detrimental action by employees of ORIC may be made to the Protected Disclosure Coordinator of the Department of Justice and Regulation:

Kris Waring
Protected Disclosure Coordinator
Department of Justice and Regulation
Level 26, 121 Exhibition Street
Melbourne Vic 3000
Telephone: 03 8684 8280
Email: kris.waring@justice.vic.gov.au

Freedom of Information

The *Freedom of Information Act 1982 (Vic)* (FOI Act) extends, as far as possible, the right of the public to access information in the possession of the Victorian Government and other bodies.

No freedom of information requests from a member of the public were received and processed in the 2017–18 reporting period in accordance with the FOI Act.

Making a request

ORIC accepts payment of the application fee by cheque or money order, made payable to the Department of Justice and Regulation.

Requests for documents in the possession of ORIC, enclosing a cheque or money order for the application fee, should be addressed to:

Freedom of Information
Racing Integrity Commissioner
PO Box 24034
Bourke Street
Melbourne Vic 3001

Further information regarding Freedom of Information can be found in the Commissioner's Part II Information Statement, available at www.racingintegrity.vic.gov.au, or on the Office of the Victorian Information Commissioner's website at www.ovic.vic.gov.au.

Finances and administration

ORIC is funded through the Department of Justice and Regulation and the State Budget. As ORIC is administratively supported by the Department of Justice and Regulation, detailed reporting relating to the financial performance, governance, workforce data and other disclosures are contained within the annual report of the Department of Justice and Regulation.

Risk management

The operations of ORIC take a risk management approach, which was adopted following an enterprise-wide risk assessment and development of a risk register. This risk assessment uses methodology based on International Risk Management Standard ISO 31000: 2009.

The Commissioner is supported by employees of the Department of Justice and Regulation, who enable the Commissioner to perform his functions and exercise his powers.

The powers and functions of the Commissioner under the Racing Act provide the framework for the operations undertaken by the Commissioner each year. Key operational activities undertaken in the 2017–18 year are set out in detail. The Commissioner's operations are summarised against the relevant provision of the Racing Act in the Operations Snapshot.



3,936km

Travelled 3,936 kilometres to host 11 roadshows in regional and metropolitan Victoria



77



874



20,000km+

Since **2012**, travelled over **20,000** kilometres to host **77** roadshows across regional and metropolitan Victoria attended by **874** attendees



2,515

Met with 2,515 stakeholders from 643 organisations

Since **2010**, met with **15,428** stakeholders



643



63

Developed and delivered professional integrity training programs to 63 course attendees



79

Undertook 79 operational visits, including 64 to race meetings, across the three codes, as well as hearings of RADBs, wagering service providers and racing laboratory visits



402

Since 2011, 402 attendances by integrity officials at ORIC training programs



24



596

Delivered 24 presentations on racing integrity to 596 attendees

Since March **2010**, a total of **6,678** people have attended presentations by the Commissioner



241

Received, assessed and responded to 241 information reports, complaints and enquiries



3



Delivered two presentations to the Apprentice Jockey Training Program and one to the Gippsland Harness Training Centre



35



29

Attended 35 country race meetings and 29 metro race meetings

Inquiries and investigations

During the 2017–18 reporting period ORIC undertook a number of inquiries and investigations into a variety of matters.

In April 2018, the Commissioner received a formal request from a controlling body to conduct an investigation into allegations that swab irregularity information had been leaked to an industry participant prior to official notification.

The racing code advised that any unauthorised release of information relating to a swab irregularity, potentially by staff from that code, was unacceptable and had the potential to undermine the integrity of the swabbing process. It noted that maintaining integrity in the swabbing process is fundamental to maintaining both industry and community confidence in the racing code.

It was requested that ORIC conduct an investigation to determine if there had been any unauthorised release of confidential information relating to swab irregularities and, if such a release of information was confirmed, then the source of that leak was to be identified and appropriate action taken.

The subsequent investigation by ORIC involved a total of 12 interviews being conducted with racing code personnel and industry participants. All relevant correspondence, including, but not limited to, investigation files, swab documentation, emails, telephone records, and racing code policies and procedures were obtained and reviewed during the investigation process.

Two racing industry participants were later identified as being in possession of swab irregularity information at a time prior to the formal irregularity notification by the racing code.

While the evidence obtained during the investigation was unable to identify a particular person or persons from the racing code who had been in contact with the relevant racing industry participants, it was confirmed that a serious breach of an integrity system and process had occurred.

It was also determined that the 'leak' of the information was identified in sufficient time by the racing code and appropriately referred to the Commissioner without any detrimental effect on the investigations into the irregularities.

At the time of this report, investigations were ongoing with areas of risk to the security of information being identified and recommendations made to the relevant racing code to address those risks immediately.

Congratulations to the ORIC team for their hard work on the latest inquiry conducted.

Anonymous

During the 2017–18 reporting period, the following significant investigations were undertaken:

- In October 2017, ORIC received a complaint regarding the alleged leaking of information relating to swabbing practices and targeted participants. It was alleged that this information was leaked by integrity officials from a nominated racing code to participants who were targeted for race day swabbing. ORIC conducted investigations into the allegations raised and was able to disprove the allegations and clear the integrity officials from any wrongdoing.
- In November 2017, ORIC received information which alleged that a nominated racehorse had been purchased using the proceeds of crime and that the ownership details of the racehorse had been fraudulently listed with the relevant controlling body. The information was investigated and with the assistance and cooperation of the relevant controlling body the allegations were disproved, with the bona fides of the racehorse confirmed and no criminality identified.
- In December 2017, ORIC received a complaint alleging incidents of race fixing in two specific races. The complainant raised further allegations of incompetence and corruption by officiating Stewards. As a result of liaison with the relevant controlling body and discussions with IBAC, an independent review panel, which included highly regarded and respected racing experts, was convened to conduct a thorough review of the races called into question and the actions of the officiating Stewards. The independent review panel found that there were no serious breaches of the rules of racing identified in any of the races subject to the allegations. A number of minor performance issues were identified and were rectified by the relevant controlling body.
- In December 2017, ORIC received information alleging that a number of race day officials were engaged in the use of illegal drugs and alcohol, with some staff affected by substances while in positions of responsibility. The information was referred to the relevant controlling body, which undertook targeted human sampling. This resulted in a number of positive tests being returned and appropriate disciplinary action taken by the relevant controlling body.
- In February 2018, ORIC received information from an anonymous racing industry participant that another racing industry participant had posted offensive and abusive comments regarding a Steward on their online social media account. The allegations were referred to the relevant controlling body which, through liaison and cooperation with ORIC, obtained all evidence and took action to ensure that the offensive posts were removed and an inquiry finalised.
- In February 2018, ORIC received an after-hours call via the ORIC Integrity Hotline in which the caller alleged that an equine trainer was stomach tubing and injecting horses with prohibited substances prior to racing. The caller nominated a specific race the following day that was to be the subject of the alleged actions and provided specific details of the substances being administered to the horse. With defined contacts and protocols, ORIC was able to refer the information directly to investigators from the relevant racing code who had sufficient time and opportunity to undertake stable inspections and race day monitoring of the alleged trainer. A successful outcome was achieved with no racehorses being subjected to race day administrations.
- In May 2018, ORIC conducted an investigation into allegations that an integrity official had deliberately falsified their identity during the conduct of an inquiry with a registered participant. The matter had been referred to ORIC by the racing code that requested that the Commissioner investigate the allegations. An investigation was conducted by ORIC with all relevant people interviewed and evidence obtained, including audio recordings and transcripts. The allegations were found to be unsubstantiated.
- In February and May 2018, ORIC was approached by integrity officials from a controlling body who were seeking assistance with investigations into the alleged use of prohibited substances by registered racing participants. Through ORIC's stakeholders and Memoranda of Understanding with various state and federal government agencies, the required information and intelligence was identified and utilised to assist in these investigations. The controlling body would not have been able to obtain that information without the assistance of ORIC.

Actions and/or behaviour of participants

During 2017–18, the Commissioner and his staff received enquiries or information relating to the actions and/or behaviour of racing industry participants, including:

- a trainer who used social media to make offensive and defamatory comments against a race day official. The matter was referred to the relevant code to be investigated and the trainer received a period of disqualification as a result
- an industry participant's use of social media to harass and defame an integrity official. This matter was investigated by the relevant code and resulted in civil legal proceedings.

In the 2017–18 reporting period, it became evident that social media use was an issue when matters of bullying, defamatory comments and inappropriate behaviour were raised.

Ownership disputes

Throughout the 2017–18 reporting period, the Commissioner received a number of complaints that related to ownership disputes involving both horses and Greyhounds. The complaints varied in nature from poor documentation and unethical conduct by syndicate management to improper sale processes. While these matters generally fall outside the Commissioner's jurisdiction, appropriate advice was given to the complainants so that they could connect with the appropriate authorities and have their matters resolved. Although many matters that the Commissioner receives are outside his jurisdiction and cannot be investigated, the complainants are given information on who to contact to resolve the issue. Where possible, the Commissioner assists by referring the complaints to the relevant controlling body or agency.

Integrity officials

A number of issues were highlighted in the 2017–18 reporting period regarding integrity officials' processes for swabbing racing animals to identify prohibited substances. The Commissioner provided advice, direction and intelligence to assist in these instances.

The swabbing procedures at a GRV race meeting were alleged to have been less stringent than required, as the Greyhound had been swabbed post-race after it had been handled and was unaccompanied and unsecured. Other trainers were found to be in the presence of a participant's Greyhound during the swabbing. These breaches of the swabbing process led to the implementation of an education/awareness program for Stewards.

Having strong integrity processes is vital to race day proceedings. The Commissioner will continue to guide and promote rigorous integrity standards and ensure they are being met.

Audits

Section 37B of the Racing Act provides for the Commissioner to conduct an annual audit of the internal integrity processes and systems of each of the three racing controlling bodies in areas identified by the Commissioner or by the Commissioner in consultation with each controlling body.

As part of this function, ORIC continues to undertake an annual audit of the private interests and declarations of integrity officials within each controlling body.

Since the inception of ORIC in March 2010, annual audits have been undertaken in relation to the following integrity related areas in the VRI.

Audit	Year undertaken	Outcome
Declarations of private interests and betting account registers	Annually	Anomalies addressed
Integrity processes and systems relating to animal welfare	2017-18	22 recommendations made to each racing code
Controls to manage 'undesirables' (persons who pose a risk to racing)	2016-17	9 recommendations made to each racing code
Drug swabbing processes	2015-16	11 recommendations, fully implemented
Career management of integrity officials	2014-15	59 recommendations pending further review
Race day animal identification	2013-14	9 recommendations, fully implemented
Industry compliance with submission and verification of private interest declarations and implementation of previous Commissioner recommendations	2012-13	13 recommendations, fully implemented
Drug sampling policies and box and barrier draws	2011-12	34 recommendations, fully implemented
Existing integrity systems and processes	2010-11	6 recommendations, fully implemented

Annual private interests and betting accounts audit

The annual audit and review of all declarations of private interests and betting account registers for each of the three racing codes was completed during the 2017-18 reporting period.

RV and GRV had both migrated their declarations to the recently created online declaration system. All integrity officials from HRV will utilise the online declaration system for the 2018-19 reporting period.

During the conduct of the audit, a small number of procedural errors were identified. However, these issues had no discernible impact on the conduct of the audit and were later rectified by the relevant racing codes.

During the course of the audit of betting account registers and declarations, two integrity officials from separate racing codes were identified as having engaged in wagering activity that may have been in breach of the codes' individual wagering policies. Further investigations identified that one of these officials had not breached their code's wagering policy. The second integrity official was found to have breached the wagering policy of their racing code and was subjected to internal disciplinary action.

'Undesirables' audit

The 2016–17 audit examined the policies, procedures and practices that exist in each of the three codes to control and manage the involvement of persons identified as a risk or potential risk to the integrity of racing in Victoria.

This audit was prompted by the concerns raised with the Commissioner by the individual racing codes, which wanted to reduce and remove persons from the racing codes who may, or do, pose a risk to the integrity of those codes (referred to as 'undesirable' persons).

The audit was completed and the recommendations were forwarded to the respective controlling bodies for feedback. The recommendations focused on:

1. applying the 'fit and proper' person test when assessing persons who seek admission as a licensed person, or who are being assessed for suitability to continue to hold a licence
2. developing guidelines for assessing a person's criminal history
3. developing a scheme requiring licensed persons to disclose any association they have with persons who have particular types of criminal or disciplinary histories
4. creating intelligence information sharing mechanisms between the three racing codes relating to licensed persons
5. educating licensed persons and participants on key integrity rules, policies and procedures.

As with all annual audits, a Single Code of Practice (SCOP) was developed to provide the codes with a set of guidelines regarding the subject matter of the audit. These guidelines are aimed at setting integrity standards for racing in Victoria.

Animal welfare processes and systems audit

The functions of the Commissioner were expanded from 4 May 2016 to conduct audits of the internal animal welfare processes and systems of each controlling body to the extent that they relate to integrity. This legislative change arose from the 'live baiting' reviews in 2015.

This first audit, in 2017–18, focused on the integrity processes and systems relating to animal welfare. This audit was completed and recommendations are currently with the controlling bodies for review and feedback.

The scope of the audit was to review the animal welfare integrity systems of RV, HRV and GRV. A comprehensive examination of the following was completed for each racing code:

- legislation
- rules
- policies and procedures
- integrity welfare frameworks
- position descriptions of officials engaged in integrity welfare roles
- capacity development of staff and participants in respect to animal welfare integrity.

A set of principles for animal welfare integrity was developed during the audit process, with a focus on a framework to design and assess the animal welfare integrity systems of a racing controlling body. The principles would:

- define 'good animal welfare'
- describe how good animal welfare will be achieved
- drive improvement in animal welfare across the industry
- develop the capacity of industry participants to deliver the desired animal welfare outcomes
- detect instances of compromised animal welfare
- detect poor behaviour by industry participants in respect to animal welfare through appropriate sanctions
- decrease the number of surplus animals that are generated throughout the lifecycle of the animal
- disclose the industry's performance in animal welfare to ORIC, Royal Society for the Prevention of Cruelty to Animals (RSPCA) Victoria and the community.

Based on the framework, 22 recommendations were developed for the three racing codes to ensure strong animal welfare integrity. The outcome of the audit indicates that some of the recommendations were fully or partially implemented.

Recommendations included:

- define 'good animal welfare'
- develop and implement an animal welfare code of practice
- develop an animal welfare integrity framework
- establish an animal welfare advisory committee
- include an expert in animal welfare on RADBs
- ensure RADBs are responsible for hearing all matters involving offences in respect to animal welfare
- account for animals born for the purpose of racing throughout their whole lives
- invite reporting of poor animal welfare, not just 'suspicious behaviour'
- provide all-hours animal welfare response capacity
- develop clear procedures for premises inspection and welfare investigations
- create a detailed animal welfare assessment for every property visit
- set monitoring or surveillance targets
- develop a stronger Memorandum of Understanding with RSPCA Victoria
- acknowledge animal 'duty of care' in all controlling body licences, registrations and employment contracts
- develop a clear pathway to officer authorisation
- develop a new animal welfare unit of competency for the VET Racing Training Package
- ensure animal welfare training is completed by all controlling body staff with an animal-related role
- ensure animal welfare training is completed by all licensed and registered members of the controlling bodies
- report key animal welfare statistics annually to ORIC
- arrange for an independent third party to perform animal welfare enforcement
- establish an external auditing regime for animal welfare integrity
- appoint suitably qualified professionals to work on all animal welfare cases.

Recommendations

Since the Commissioner commenced his role in 2010 a total of 218 recommendations have been made (this does not include 22 recommendations made as a result of the integrity processes and systems relating to animal welfare audit), of which 213 or 97.71 per cent were implemented.

A total of 166 recommendations were made to the racing codes and all recommendations to the three codes were implemented.

Code/body	Number of recommendations made	Number of recommendations implemented	Percentage
RV	45	45	100
GRV	62	62	100
HRV	59	59	100
Government	38	33	86.84
Others	14	14	100
Total	218	213	97.71

ORIC has a customised case management system that records, manages and reports on information and intelligence received in the form of complaints, information reports and enquiries. Own Motion Inquiries, special inquiries, investigations and referrals from the Minister and controlling bodies are also managed on the case management system.

Complaints

During the 2017–18 reporting year, ORIC received 67 complaints. These complaints comprised allegations involving a range of issues including:

- breaches of the rules of racing
- lack of integrity by Stewards
- inappropriate behaviour by Stewards
- corruption
- animal welfare
- the action and behaviour of other racing participants
- racing clubs and racing officials.

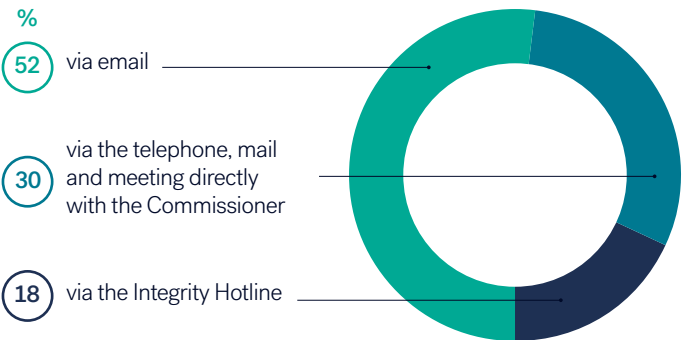
How were the complaints received?

A total of 88 per cent (59) of all complaints were received overtly while the remaining 12 per cent (8) complaints were received anonymously.

Complaints were received predominantly by email and via ORIC’s Integrity Hotline as follows:

- 52 per cent (35) received via email
- 18 per cent (12) received via the Integrity Hotline.

The remaining 30 per cent (20) of complaints were received via the telephone, mail and meeting directly with the Commissioner.



What did the complaints relate to?

Of the 67 complaints, 63 related to the controlling bodies as follows:

- 58 per cent (39) of complaints involving RV
- 21 per cent (14) of complaints involving GRV
- 15 per cent (10) of complaints involving HRV.

What do the complaints tell us?

Overall, complaints increased by 26 per cent (14) from the previous year. The most significant increase was RV matters with a rise of 105 per cent (20 complaints). This increase was likely stimulated by the widespread media coverage of high profile Thoroughbred racing investigations throughout the year.



Code	2010 2011	2011 2012	2012 2013	2013 2014	2014 2015	2015 2016	2016 2017	2017 2018
GRV	14	9	5	9	21	30	25	14
RV	16	5	6	10	12	25	19	39
HRV	8	3	7	3	11	5	6	10
Other	4	0	4	2	3	4	3	4
Total	42	17	22	24	47	64	53	67

What were the outcomes of the complaints?

Several complaints involved multiple allegations. A total of 67 complaints were received, of which 60 were completed. Out of these 60 complaints, there were 67 allegations:

- 40 per cent (27) were outside the Commissioner's jurisdiction
- 32 per cent (22) were either disproven or found unsubstantiated
- 5 per cent (3) were deemed to be for information purposes only
- 18 per cent (11) were either substantiated or partially substantiated.

Additionally, 5 per cent (4) of allegations were unable to be investigated, as the complainant failed to reply to ORIC's request for further information.

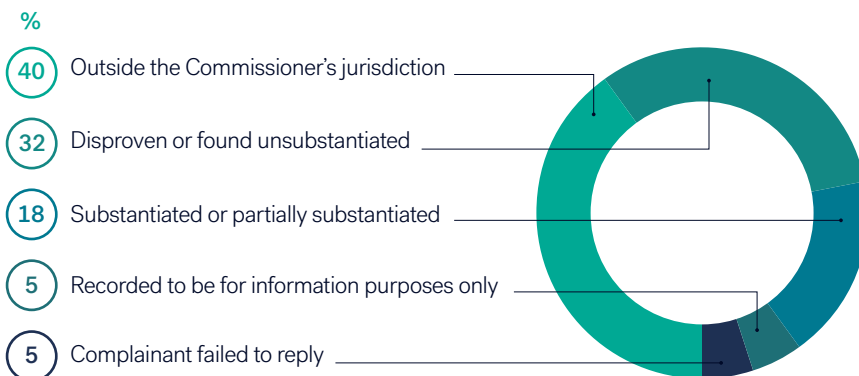
Of the allegations that were either substantiated or partially substantiated, all were referred to the relevant controlling bodies for further investigation. As a result, appropriate actions were taken to address the allegations. Some of these actions included:

- a trainer issued with a disqualification period for highly inappropriate and offensive social media commenting
- a warning issued to a steward for inappropriate conduct
- an integrity official resigning from their role following an investigation into workplace misconduct.

Seven complaints remain under investigation as at 30 June 2018.

ORIC has a customised case management system that records, manages and reports on information and intelligence received in the form of complaints, information reports and enquiries.

Outcomes of complaints



Information Reports

An Information Report (IR) is a term applied to a document or computer entry recording information and intelligence received by ORIC.

During the 2017–18 reporting period, ORIC recorded 80 IRs. These IRs related to a number of issues:

- ownership disputes
- racing rule breaches
- criminal behaviour and criminal offences
- animal welfare issues, including complaints about use of whips and allegations of animal cruelty and neglect
- illegal betting practices.

How were the IRs received?

A total of 62 per cent (50) of IRs were received overtly, including:

- 43 per cent (35) via the telephone and meetings
- 12 per cent (10) via the Integrity Hotline
- 16 per cent (5) directly by mail.

A further 34 per cent (27) of IRs were received either anonymously or via identity protected methods, and 4 per cent (3) were via open source information.



What did the IRs relate to?

Of the total number of IRs, 91 per cent (73) related to the controlling bodies, with 41 per cent (33) related to RV, 25 per cent (20) related to HRV and 25 per cent (20) related to GRV.

Of the remaining 9 per cent, five were for all three codes. One IR related to an interstate code and one related to an international issue.

What were the outcomes of the IRs?

Several IRs included multiple allegations. Of the 80 IRs completed, there were 83 allegations made. The outcomes of the allegations were:

- 30 per cent (25) were disproven or unable to be substantiated
- 11 per cent (9) were not within the Commissioner's jurisdiction
- 6 per cent (5) were substantiated or partially substantiated and mainly related to issues such as wagering and race fixing.

A total of 53 per cent (44) were recorded for information purposes only.

Of the 80 IRs received and recorded, ORIC referred and/or disclosed to a controlling body or government agency on 39 occasions for information and/or investigation purposes.

What do the IRs tell us?

The total number of IRs decreased by 7 per cent (6) from last year, when ORIC received 86 IRs. The decrease was primarily attributed to a decrease in GRV IRs, which fell 185 per cent (17). There were minor increases for RV and HRV, with 10 per cent (3) and 25 per cent (4) increases respectively.

Leading themes in GRV IRs included animal welfare, anti-social behaviour at tracks by industry participants and criminal behaviour by industry participants. IRs relating to RV also included criminal behaviour and animal welfare issues, with allegations of prohibited substances being the most prominent.

Developed a new betting and racing model that detects and reports on suspicious performance or activity based on pre-determined indicators of risk. The model provides 'real time' analysis and forecasts predictions in support of the Investigations Unit and the Stewards panel.

Greyhound Racing Victoria



Enquiries

An enquiry refers to a request made to ORIC for advice or assistance, or questions, comments and opinions on current issues, mainly arising from media reports.

How were the enquiries received?

During the reporting period, ORIC received 96 enquiries. Of these:

- 52 per cent (50) were from the public
- 18 per cent (17) were from industry participants and employees
- 6 per cent (6) were from law enforcement bodies
- 5 per cent (5) were from integrity personnel of individual codes and Stewards
- 4 per cent (4) were from other government agencies.

The remaining 15 per cent (14) were in relation to the media, wagering or betting providers and community groups. The majority of enquiries related to integrity in racing, race fixing, media enquiries and corruption. Racehorse and Greyhound ownership enquiries were also prevalent, as were enquiries relating to wagering.

The majority of enquiries — 62 per cent (59) — were received via telephone.

Which code did the enquiries relate to?

Of the 96 enquiries, 68 per cent (65) related to controlling bodies with:

- 42 per cent (40) related to RV
- 15 per cent (14) related to GRV
- 6 per cent (6) related to HRV
- 5 per cent (5) related to all three codes.

A further 6 per cent (6) of enquiries were non-specific, 5 per cent (5) related to an interstate code or overseas jurisdiction and 4 per cent (4) related to wagering providers. The remaining 17 per cent (16) of the enquiries related to government agencies, other sporting codes and community groups.

Racing Integrity Hotline

The Racing Integrity Hotline (1300 227 225) is provided through an independent third party organisation, STOPline Pty Ltd. The hotline is an important integrity assurance tool, allowing members of the public and/or racing industry participants to report integrity related information anonymously through an alternative means rather than contacting ORIC directly.

The hotline is staffed by a team of personnel trained to receive information in the strictest of confidence. Importantly, it allows a complaint to be made anonymously if the complainant chooses, with details of the caller not disclosed to ORIC if so requested.

During the 2017–18 reporting period, ORIC received 57 reports from STOPline, comprising non-disclosures and disclosures. Non-disclosures refer to reports that do not fall within the Commissioner’s jurisdiction.

In 2017–18, a large number of non-disclosures related to ownership dispute issues.

Disclosures contain integrity related information involving, for example, animal cruelty, use of prohibited substances, breaches of rules and procedures, bullying and harassment, race fixing and corrupt conduct.

Racing Integrity Hotline	2010	2011	2012	2013	2014	2015	2016	2017
	2011	2012	2013	2014	2015	2016	2017	2018
Disclosure	14	11	28	4	34	24	20	33
Non-disclosure	14	9	21	5	4	3	1	24
Total	28	20	49	9	38	27	21	57

“Thank you for providing feedback about this issue as I was not expecting it. Your department is providing a very useful service especially for this region where the local council and other animal welfare bodies have a ‘disinterested and too busy to investigate’ attitude. Thank you again”

Anonymous
Feedback in relation to ORIC and STOPline

Website

The Commissioner’s website (www.racingintegrity.vic.gov.au) is a central repository for information relating to ORIC and provides information such as the Commissioner’s role, links to public documents published by ORIC, advice on how to lodge a complaint with ORIC or provide integrity related information, and ORIC’s media policy and media releases. ORIC develops and manages the website content, with the website hosted by the Department of Justice and Regulation.

During 2017–18 the website attracted 4,045 visits, with 3,054 visitors from 53 countries. Of these visits, 82 per cent (3,312) were from Australia and 58 per cent of the Australian visits (2,353) were from within Victoria.

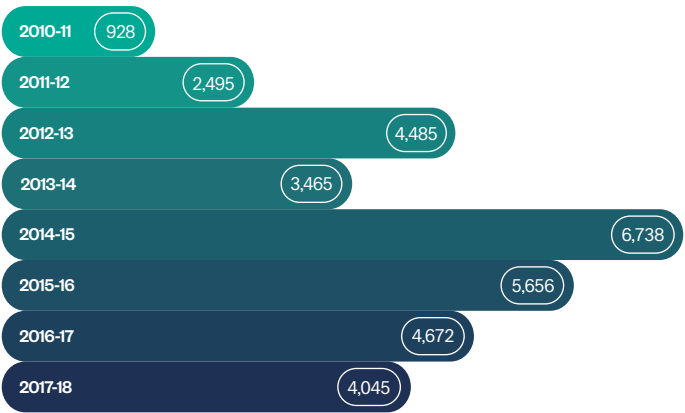
An analysis of the visits to the website show that, during 2017–18, the majority of visits were in relation to the functions and powers of the Commissioner, seeking advice/assistance, media releases, roadshows and events, and publications such as annual reports.

Traffic was directed to the website via four methods:

- 68 per cent of visitors used a search engine
- 24 per cent went directly to the website
- 7 per cent were referred from other websites
- 1 per cent linked to the website from social media.

People spent an average of one minute 25 seconds on the website and accumulated 10,077 page views reviewing the site’s content.

Website visits per year

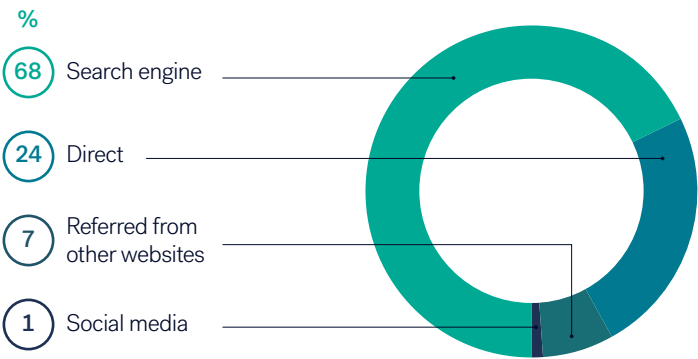


Directing a RADB

One of the functions of the Commissioner (section 37B of the Racing Act) is to direct a RADB to hear and determine an appeal made by a person against a penalty imposed on the person under the rules of a controlling body, if the penalty is a fine of no more than \$250 and the Commissioner considers that it is in the public interest for the appeal to be heard.

During the 2017–18 reporting period no applications to direct a RADB to hear and determine an appeal were received by the Commissioner.

Traffic directed to website





Q. What were your highlights over the last 12 months?

A. There were a lot of highlights, and most of them are detailed in this Annual Report. Concluding the audit we started last year to identify the controls in place over people who pose integrity risks to racing was one. Another was enhancing our focus on animal welfare by conducting an audit on the integrity systems and processes in the three codes relating to animal welfare. Surveying racing industry participants on their views of integrity for the very first time was a highlight. Introducing a new training program for integrity officials on how to use the internet as an investigative tool was another key initiative. From an industry perspective, I was pleased that the Racing Victoria cobalt investigation and the Aquanita investigations both concluded.

Q. Two of the presentations you delivered during the year were to the RSPCA AGM and the Victoria Police Sports Integrity Symposium at the MCG. Do you think delivering presentations is an important requirement of your role?

A. I've never thought of presenting as a requirement or an impost. I see it more as a critical part of my role and an essential way of engaging with a variety of people. It creates awareness of my role and the work of our office. It's also an opportunity to promote the high standards of integrity in Victorian racing and answer questions on aspects people are interested in.

Q. Does that extend to presentations and interactions you have with people and organisations outside Victorian racing?

A. Yes it does. We've built, and are continuing to build, strong relationships with other racing integrity bodies such as the Queensland Racing Integrity Commission and the NSW Greyhound Racing Welfare and Integrity Commission, and with non-racing integrity-focussed bodies such as the Australian Criminal Intelligence Commission and IBAC. We also have close relationships with overseas bodies such as the Hong Kong Jockey Club. It's important that we understand what the current and emerging integrity risks are in racing outside Victoria and outside racing, whether in Victoria or elsewhere. This knowledge helps inform our strategies and approaches.

Q. You've been in this role, focused on racing, for eight years now. Do you think a similar role is needed for sport generally?

A. Yes. My view is that oversight roles are best performed by those who are independent of the organisation, industry or sport they're overseeing. It's one of the main reasons organisations engage consultants when they want to review or investigate aspects of their organisations. Independence and objectivity are important. Recently, the Minister for Sport initiated a Victorian Sports Integrity Network to assist and advise sports on integrity related aspects. Integrity is vital in any sport and this is a step in the right direction.

Q. One of your functions is to undertake an annual audit. What was the major audit for 2017-18 and what will you audit in 2018-19?

A. There's no long term plan for what the subject of the audits will be each year. The decision is mainly based on current or emerging integrity issues. In 2017-18, we looked at the animal welfare frameworks in place in each of the three codes. This was due to my functions being expanded by legislation in May 2016 to encompass welfare. The audit was essentially a 'stocktake', looking at what each code has in place to address welfare aspects as they relate to integrity. It gives us a starting point for ensuring that we can identify the systems and processes and enhance them where necessary. The 2018-19 audit will focus on the management of investigations. Each code has invested in building an investigative capacity and each has managed major investigations. The audit will look at what systems, processes and resources are in place to manage investigations in each of the codes.

Q. You have a unique perspective because you can see what's happening in integrity issues across all three codes. How do you respond to questions about the level of integrity in Victorian racing when there's widespread media reporting on the major investigations?

A. What isn't publicly known is the amount of time, effort and resources that are put into integrity by each of the three controlling bodies. Racing Victoria, Harness Racing Victoria and Greyhound Racing Victoria have all significantly improved their approach to integrity over recent years. One example is the recruitment of specialists to perform roles such as intelligence analysis and investigation management. There is now a proactive approach to identifying potential integrity risks through risk analysis programs and the contracting of form and betting analysts. Another example is the focus on use of new technologies. RV's integrity operations control room and the use of drones by HRV and GRV are also good examples.

Because I'm aware of these efforts, when a major issue is reported on in the media I know the amount of work behind the detection and prosecution of the people involved. It's great when the codes' good work results in a successful investigation. The disappointment, of course, is that people will break the law or the rules of racing for personal gain.

Q. You've spoken about the strong focus you place on engaging with stakeholders and the importance of your office being familiar with the racing environment. Is that still a major focus for you?

A. Definitely. Racing is a complex sport and industry. There are about 3,500 rules of racing. It's a billion dollar industry that has a high profile and is a major contributor to the Victorian economy. Continual engagement and familiarisation is critical for us. We'll continue to be active in engaging with stakeholders and understanding racing through race day and other operational visits. Racing participants are the lifeblood of the industry and their knowledge, advice and experience help us to understand the industry and perform our functions. In the past year we've met with 2,515 people and undertaken 79 operational visits.

Q. A look at your Annual Reports also shows that you have a strong view that professional training is important to integrity staff. Are you still providing training programs, and what are your future aims?

A. Training is critical. The racing industry and the general public have high expectations of the competency of staff who are performing integrity roles. We're doing our best to provide some of that training. In 2017-18 we created a new training module to assist intelligence analysts and investigators to conduct online investigations. This is a specialist skill and one that's becoming critical to their ability to undertake investigations. My ultimate aim is that, in the near future, anyone who works in an integrity role will be recognised as a 'professional' and will have come through a formalised career development program that includes tertiary qualifications. Earlier this year we met with tertiary education providers that are delivering sports integrity programs and are keen to build on this possibility. Eventually, an integrity official in racing will have the qualifications and expertise to work as an integrity official in any sport. This will pave the way for a broader and more exciting career path and develop into a discipline, evolving just as sports administration has.

Q. You've also been pushing for a number of years for the establishment of an independent integrity body in racing. Has your enthusiasm waned?

A. Not at all. In my view, independence is a critical success factor when it comes to integrity. My role was created for that reason. Bodies such as IBAC are created for that reason. Similarly, a cross-code approach is vital. Each of the three codes invests heavily in staff to perform integrity roles and they're performing similar roles. I see lots of good reasons why integrity staff should all be brought together in a cross-code and independent body. Since I started in this role in 2010, the Queensland Racing Integrity Commission and NSW Greyhound Welfare and Integrity Commission have been established for those reasons. Our surveys of the racing industry and the general public indicate support for my view and I'll continue to advocate for an independent cross-code body for Victoria.

Q. Amendments to the Racing Act over the years have added to your powers and functions. Do you think there should be more changes?

A. I think that, generally, my powers allow me to perform my functions. The one power I don't have is to access historical telecommunication data or what's commonly referred to as 'call charge records'. This would enable me, for example, to look at a mobile phone's usage and see what numbers were called and at what time and date. This isn't something a change to the Racing Act would address though, as it's a Commonwealth issue and the Commonwealth Attorney-General would need to give me that authority. The frustration is that it's a basic investigation tool and I once had that ability until October 2015 when it was changed. My request to be re-authorised has been supported by the Minister for Racing who is also the State's Attorney-General.

Q. Many of your investigations and audits result in recommendations to the three codes to implement your findings. How many recommendations have you made and how many of them have been implemented?

A. At last count, there have been 218 recommendations, 166 of those were recommendations made to the three codes. All have been implemented.



Streamlined the HRV RAD Board process. The new process involves licensed participants being provided with a limited brief of evidence at the time of laying charges, giving the licensed participant 14 days to provide a response on their intention to plead either guilty or not guilty.

Harness Racing Victoria



A complete summary of the Commissioner's operations against the framework provided by the Racing Act is set out below:

Section 37B of the Racing Act

1a.	<p>Conduct annual audits of the internal integrity processes and systems, in whole or in part, of each controlling body in areas identified –</p> <ul style="list-style-type: none"> i. by the Racing Integrity Commissioner; or ii. by the Racing Integrity Commissioner in consultation with each controlling body 	<p>A total of two audits were undertaken during the period pursuant to this function.</p> <p>ORIC completed one audit regarding the declarations of private interests and betting account registers of the controlling bodies.</p> <p>One audit focused on examining each of the controlling bodies' racing rules, policies, procedures, practices and guidelines to ensure each of the codes controls/manages the involvement of persons identified as a risk or potential risk to the integrity of racing ('undesirables'). The audit was completed, with final recommendations provided to the respective codes.</p>
1b.	<p>Conduct audits outside the subject matter of the annual audit if a controlling body requests that such an audit be conducted</p>	<p>No requests were received from the controlling bodies to conduct an audit in the reporting period.</p>
1ba.	<p>Conduct audits of the internal animal welfare processes and systems of each controlling body to the extent that they relate to integrity in racing</p>	<p>An audit of the internal animal welfare processes and systems during the 2017–18 reporting period was conducted and completed. A total of 22 proposed recommendations were made to each racing code.</p>
1c.	<p>Investigate complaints made about the integrity processes and systems of a controlling body</p>	<p>The Commissioner investigated 67 complaints relating to the integrity processes and systems of the three controlling bodies. Of these, 21 per cent involved GRV, 58 per cent involved RV and 15 per cent involved HRV.</p> <p>The Commissioner also received 80 IRs relating to racing matters. Of these, 25 per cent related to GRV, 25 per cent related to HRV and 41 per cent related to RV. A further 5 per cent related to information relevant to all three codes.</p>
1d.	<p>Refer complaints to controlling bodies or other government agencies for investigation</p>	<p>A total of 19 complaints were referred to a controlling body or government agency for investigation during the reporting period.</p> <p>The office also referred 20 IRs to a controlling body or government agency for information and/or investigation.</p>

Section 37B of the Racing Act

1e. Investigate matters referred by the Minister or a controlling body	<p>The Commissioner received two referrals from the Minister during the 2017–18 reporting period:</p> <ul style="list-style-type: none"> • The first complaint related to allegations that a senior integrity official from one of the racing codes had a perceived and/or real conflict of interest with a racing industry participant. It was alleged that the integrity official was identified socialising with an industry participant and that this participant was later subjected to favourable treatment by the integrity official during a race meeting by being excluded from the drug swabbing process. • The second complaint related to allegations of misconduct and offensive behaviour towards women by a racing official employed by one of the racing codes. It was further alleged by the same complainant that Stewards from the racing code in question had permitted a participant to breach the rules of racing through the use of unapproved racing gear. The first allegation in this complaint was investigated by the racing code and substantiated, with internal disciplinary action taken. No criminal offences were identified. The allegation of a breach of the rules of racing not being appropriately enforced by Stewards from the relevant controlling body was investigated and not substantiated. <p>Three referrals from the controlling bodies requested the Commissioner investigate alleged breaches of integrity systems and processes of a controlling body. These matters are subject to ongoing investigations.</p>
1f. Report findings of investigations conducted into complaints that have not been referred to other bodies – <ol style="list-style-type: none"> to the person that made the complaint; and with or without identifying the person who made the complaint or the person that is the subject of the complaint, the Minister or the relevant controlling body (as the Racing Integrity Commissioner considers appropriate) 	<p>Of the 67 complaints received by ORIC, 25 were investigated and completed during the 2017–18 reporting period. Complainants were advised of the findings in all instances.</p> <p>Of the remaining complaints, 34 investigations were not required as they were either comment and/or opinion based and unrelated to integrity systems and/or processes, outside the Commissioner's jurisdiction, or the complainant failed to provide sufficient information to warrant investigation. Seven investigations are ongoing.</p> <p>Controlling bodies are not automatically advised of findings in cases where the complaints were found not to be integrity related or were unsubstantiated, or where the controlling body was involved in the investigation with the Commissioner.</p>
1g. Conduct own motion inquiries that do not relate to any specific complaint and may include an investigation into systemic issues in racing	<p>The Commissioner did not conduct any own motion inquiries in the reporting period.</p>

Section 37B of the Racing Act

<p>1h. Make recommendations (if appropriate) following the investigation of any complaint, inquiry or matter to (as the Racing Integrity Commissioner considers appropriate) –</p> <ul style="list-style-type: none"> i. the Minister; or ii. the relevant controlling body 	<p>The Commissioner did not make any recommendations following the investigation of any complaint, inquiry or matter to the Minister or the relevant controlling body.</p>
<p>1i. Direct a Racing Appeals and Disciplinary Board to hear and determine an appeal made by a person against a penalty imposed under the rules of a controlling body if –</p> <ul style="list-style-type: none"> i. the penalty imposed is a fine of not more than \$250; and ii. the Racing Integrity Commissioner considers that it is in the public interest for the appeal to be heard 	<p>During the 2017–18 reporting period, the Commissioner did not receive any requests to exercise his powers under this section.</p>
<p>2. Advise the Minister of any failure by a controlling body to implement or act on a recommendation made by the Racing Integrity Commissioner to that controlling body</p>	<p>During the 2017–18 reporting period, the Commissioner did not exercise his powers under this section.</p>

Section 37BA of the Racing Act – Powers of the Racing Integrity Commissioner conducting an inquiry

During the 2017–18 reporting period, the Commissioner did not exercise his powers under section 37BA.

Section 37E of the Racing Act – Disclosure of Information

The Commissioner made 56 disclosures of integrity related information to a range of authorised bodies and agencies during the reporting period. The disclosures were made in accordance with section 37E of the Racing Act.

Entered into a Memorandum of Understanding with the RSPCA to formalise the process of welfare related matters. This agreement will allow exchange of information between agencies, ensuring welfare matters are dealt with appropriately.

Racing Victoria



Strategic priorities

Each year, the Commissioner identifies a range of activities to enhance the integrity of the VRI through key priorities. In the 2017–18 financial year, these were:

- capability development
- environmental scanning
- investigations, audits and reviews
- education and awareness
- corporate management
- performance reporting
- major projects.

To meet these priorities a total of 91 activities were identified, of which 79 were completed, two are a work in progress and will be carried over into the 2018–19 financial year, eight are on hold pending legislative/departmental decisions, and two were discontinued.

In addition, ORIC undertakes activities that are considered 'business as usual'. While these are not included in each year's business plan, they are reported against and undertaken every year. In the 2017–18 financial year, there were a total of 63 'business as usual' activities.

Working with stakeholders

Stakeholder engagement is at the core of the Commissioner's business. Every day, across all activities, the Commissioner and his staff engage with people who are in some way connected to ORIC's purpose. The quality of these relationships with stakeholders determines how well ORIC delivers on its vision of a VRI in which Thoroughbreds, Standardbreds and Greyhounds compete to the best of their natural ability, free from the influence of crime and corruption.

Stakeholder engagement and familiarisation are vital to ensuring ORIC:

- improves information flows by tapping into local and informed knowledge
- develops informed policies, projects, programs and services
- stays abreast of current and emerging issues
- remains alert to the views of stakeholders
- enhances public confidence by creating awareness of existing integrity safeguards within the VRI.

For stakeholders, engaging with ORIC also presents opportunities to contribute to policy and program development, have their issues and ideas heard and acted on, participate in decision-making processes and be a driving force behind integrity reform.

Stakeholder engagement is at the core of the Commissioner's business. Every day, across all activities, the Commissioner and his staff engage with people who are in some way connected to ORIC's purpose.

Key stakeholders

ORIC has adopted a consultative approach to integrity reform, which includes liaising with the public as well as:

- the controlling bodies, and their state, interstate and international counterparts
- law enforcement agencies
- media
- racing associations, including owners, trainers, jockey and driver associations and unions
- regulators
- wagering service providers
- Racing Analytical Services Limited (RASL)
- members of the judiciary, including the Victorian Civil and Administrative Tribunal and RADB members
- ancillary bodies such as the Australian Transaction Reports and Analysis Centre, the Australian Tax Office and the Office of the Chief Examiner
- racing clubs
- national coordinating bodies (including Racing Australia, Greyhounds Australasia and Harness Racing Australia)
- internal stakeholders (Department of Justice and Regulation and the Minister for Racing).

These relationships ensure the Commissioner is kept apprised of emerging integrity related issues within the VRI and is well placed to address those issues in accordance with his legislative mandate.

Meetings and presentations

During the 2017–18 reporting period, the Commissioner and his staff met with 2,515 people from 643 organisations. On average, ORIC met with 209 people per month.

Presentations by the Commissioner to the racing industry, other stakeholders and the general public formed a key component of this year's engagement program. A total of 24 presentations were made during the year to 596 attendees, which included presentations to representatives of organisations such as the RSPCA, Victoria Police, Steward and jockey training programs, sporting clubs, racing clubs, industry bodies, community and service organisations and the general public.

Since commencing operations in March 2010:

- the Commissioner and his staff have met with 15,428 people
- a total of 6,678 people have attended presentations by the Commissioner.

“A belated note to express my sincere thanks re: you making the time to visit Three Bridges Thoroughbreds... it meant a lot and the team were in awe of your experience. Being out of the corporate world, life is very different, yet it's good to keep learning. Having such a professional as yourself spend time sharing your wealth of knowledge was priceless.”

Jackie Noonan

Three Bridges Thoroughbreds

Operational visits

This year, ORIC undertook 79 operational visits. These included 64 to race meetings across the three codes, hearings of the RADB, and visits to RASL, breeding and training properties, and wagering service providers. Of the race meetings attended, 35 were country meetings.

Industry partnerships

The Commissioner recognises that he cannot deliver on his mandate alone, and remains committed to building strong industry partnerships with organisations that ensure the effective operations of ORIC. These partnerships contribute to the integrity of the VRI by allowing those in the industry to work towards collaborative solutions to shared challenges.

Racing Integrity Operations Committee

The Racing Integrity Operations Committee (RIOC) was established by the Commissioner in 2010 to facilitate discussion of integrity related matters across the entire VRI.

The RIOC is chaired by the Commissioner, with membership comprising the Integrity General Managers and Chairmen of Stewards from each of the controlling bodies, the ORIC Manager Integrity Operations and the ORIC Manager Investigations.

The RIOC generally meets every six weeks, with six meetings occurring during the reporting period. In total, the RIOC has met 58 times since inception and continues to be a valuable forum to share and exchange information across the three racing codes.

Integrity Council Forum

The Commissioner convenes the Integrity Council Forum (ICF) to ensure the appropriate level of integrity assurance and oversight is in place. The ICF encourages cross-code collaboration in respect of integrity measures to ensure that public confidence in the VRI is maintained.

An integral recommendation following the Commissioner's 2012 Own Motion Inquiry into race fixing was that the Racing Act be amended to establish an independent body with responsibility for the integrity processes and systems across the three codes, removing the responsibility from the controlling bodies.

In response, in March 2014, the then Premier and Minister for Racing endorsed an alternate model with an independent Integrity Council for each racing code. Each of the controlling bodies subsequently established its own respective Integrity Council.

The ICF usually meets on a quarterly basis, with two meetings held in the reporting period. Chaired by the Commissioner, the meeting is attended by the Chairman from each of the Integrity Councils, as well as the ORIC Manager Integrity Operations or ORIC Manager Investigations.

Information exchange

Since commencement in March 2010, ORIC has formed effective working relationships with the VRI, state and federal law enforcement agencies and other organisations of relevance to integrity.

One measure of the success the Commissioner has had in this regard is the development and implementation of formal information sharing arrangements to enhance the ability of authorities to identify and investigate integrity related matters within the racing industry. The Commissioner's efforts ensure the body of agreements facilitating exchange of information continues to grow on a state, Commonwealth and international level.

Agreements

The Commissioner has a number of agreements in place relating to the information exchange and facilitation of cooperation between the Commissioner and other parties.

In May 2018, the Commissioner entered into a new agreement with Tabcorp Wagering (Vic) Pty Ltd relating to information exchange.

Professionalising integrity

The Commissioner's commitment to the professionalisation of racing integrity officials continued during the 2017–18 reporting period.

The Commissioner has a key role in ensuring close cooperation between the three racing codes and takes a leadership role in ensuring common practices across the codes. As a result the Commissioner has developed a training program to ensure that Stewards and integrity officials have the skills and knowledge required to perform their duties.

The Integrity Investigators Forum *Module One – The Essentials of Investigation* and *Module Two – Collection and Presentation of Evidence* were designed to create an understanding and knowledge base of the essential competencies required of Stewards and integrity officials.

These two modules encompass the following topics:

- The principles of investigation
- Avenues of inquiry
- Statement taking
- Witness management
- Interviewing
- Human source management
- Brief preparation
- Presentation of evidence
- Advocacy.

The fifth course of these training modules was conducted in September 2017. A total of 22 integrity officials from the three racing codes attended Module One, with 23 attending Module Two.

The Commissioner has a key role in ensuring close cooperation between the three racing codes and takes a leadership role in ensuring common practices across the codes.

A new Integrity Investigators Forum (*Module Six – Online Investigations*) was created and conducted in 2018. The purpose of this Module was to enhance investigators' understanding and knowledge of the essential elements of online intelligence gathering and investigations.

The course included the following topics:

- Technical specifications
- Evidence collection and handling
- Legend building and backstopping
- Effective searching online
- Social media platforms
- Advanced search techniques.

In May 2018 two courses of Module Six were conducted at Tennis Australia Headquarters, with 20 investigators and intelligence practitioners from the three racing codes, the Australian Football League and Tennis Australia attending.

Since the inception of the Commissioner's training forums, 20 modules have been presented to 402 attendees.

In his quest for integrity officials to be recognised as professionals, the Commissioner convened an inaugural stakeholder meeting in February 2018. This meeting brought together integrity managers and educators from the three racing codes and tertiary education providers to discuss the introduction of a formalised training model for integrity officials. Further discussions will occur in the near future.

“I write on behalf of persons within our organisation, my friends, breeders and punters to simply thank you for your diligence.

We understand the presumption of innocence and procedural fairness therefore write not to suggest an outcome.

However, we are allowed an opinion, which is ‘no surprise’ in regard to the charges.

We gamble on horses on evidence based form on a level playing field, however we all know some parties operate under different values...”

Anonymous

**Feedback
received from
the integrity
officials who
attended
Module One:**

“Pertinent examples and great practical applications of what was covered...”

“Loved the content of the course, it was really useful.”

“It was an excellent course with top rate speakers.”

“It was great. Thoroughly enjoyed the course, it was entirely relevant to my role.”

“For my role Module #1 was really useful.”

**Feedback
received from
the two courses
that were
conducted of
Module Six:**

“...Very well presented and although I am not computer savvy, still will take away quite a bit from the course.”

“Well delivered and relevant to this space. Some very useful tools...”

“Well structured with a lot of content, would like to see an advanced course on this topic.”

Roadshows

This year the roadshows were presented in a less formal 'Q&A' information session approach, in contrast to the formal presentations of previous years. The sessions were conducted at race clubs on race days. The new approach was in response to feedback received from previous roadshow attendees.

The Q&A sessions were aimed at building on those undertaken in the previous six years to create a greater understanding and awareness of the Commissioner's role and responsibilities, the work ORIC has undertaken and an overview of what is in place to ensure that the VRI operates free from the influence of crime and corruption.

The roadshows provided anyone attending the race meetings with an opportunity to raise questions and to hear first-hand the Commissioner's perspective on integrity in the racing industry.

A number of themes emerged during the sessions, including:

- mismanagement
- conflicts of interest
- lack of understanding in relation to prohibited substances
- live baiting
- inconsistency in RADB penalties
- improving infrastructure in racing clubs.

Over the past seven years, the Commissioner has travelled over 20,000 kilometres to host 77 roadshows across regional and metropolitan Victoria. These attracted 874 attendees including racing industry participants, the general public, wagering service providers, media and others.

The aim of the roadshows is to inform stakeholders of the activities of ORIC and the VRI more broadly, and to gain real insight into the views of stakeholders. During the reporting period, the Commissioner hosted 11 roadshows in Horsham, Bendigo, Melbourne, Sale, Cranbourne, Mildura, Shepparton, Swan Hill, Ballarat, Geelong and Warrnambool for 81 attendees.

A total of 93 per cent of the audience comprised racing industry participants, with 42 per cent from Harness, 37 per cent from Thoroughbreds and 14 per cent from Greyhounds. Six per cent of attendees were general public and the remaining 1 per cent was from a controlling body.

Integrity initiatives

The Commissioner's role gives him the opportunity to approach integrity related issues from a holistic, industry-wide perspective that is not confined to a single code or component of racing. This integrated approach allows ORIC to play a vital role in the development and facilitation of integrity initiatives that benefit all three racing codes.

Single Code of Practice

The 2008 Report on Integrity Assurance in the Victorian Racing Industry, conducted by Judge Gordon Lewis AM, noted a lack of consistency among the racing codes in the VRI in their approaches to integrity.

To establish consistent integrity standards across the VRI, the Commissioner identified the need to develop a SCOP that embodied a set of minimum integrity standards for racing officials and industry participants in all three racing codes.

The SCOP is designed to ensure cross-code consistency across a range of apparent or emerging integrity related issues that are common to all three racing codes. The ultimate aim of the SCOP is to develop a complete set of standards that cover all aspects of integrity assurance in the racing industry.

The table below presents a summary of the SCOP designed to address the following integrity matters:

Single Code of Practice	Relates to	RV	HRV	GRV
Part A	Integrity standards for racing officials	Implemented 24 May 2015	Implemented 1 June 2015	Implemented 31 December 2014
Part B	Integrity standards for industry participants	Implemented 31 July 2017	Implemented 8 August 2017	Implemented 31 December 2014
Part C	Rules of racing	Implemented 1 August 2016	Implemented 1 March 2016	Implemented 23 June 2017
Part D	Drug control	Implemented 1 August 2016	Implemented 1 October 2016	Implemented 26 September 2017
Part E	Animal identification	Implemented 26 June 2017	Implemented 1 January 2017	Implemented 4 November 2016
Part F	Integrity Hotlines	Implemented 3 November 2016	Implemented 3 November 2016	Implemented 4 November 2016
Part G	Undesirables	Pending implementation	Pending implementation	Pending implementation

General Public Survey 2018

Roy Morgan Research was engaged to conduct the 2018 General Public Survey. This is the seventh year ORIC has commissioned the survey.

The purpose of the survey is to measure the general public's confidence in the integrity of the VRI. It allows ORIC to prioritise future planning and office activities that are focused on public concern across the three racing codes.

In total, 910 online surveys were completed between 15 January and 22 January 2018. The sample was stratified based on the age, gender and location quotas.

The survey included questions in relation to:

- respondents' personal attendance at the races over the past 12 months
- wagering activity
- confidence in the integrity of the VRI
- awareness of the Commissioner's position
- possible changes in behaviour or attitude as a result of media.

The continuing nature of the survey allows ORIC to gauge the impact of recent events on respondents, identify trends and ultimately develop a reliable body of social research specific to the VRI.

The same type of survey was conducted in 2017. The key results of the 2017 and 2018 surveys are presented in the table opposite, together with the results of the 2017 Racing Industry Participants Survey. In 2017, the Commissioner invited 13 organisations that represent participants of the VRI to take part in this new initiative. The purpose of the survey was to gain an understanding of the attitudes of the VRI participants, including trainers, breeders, owners, drivers and jockeys, and to identify emerging issues. The same questions in the General Public Survey and the Racing Industry Participants Survey were used to gauge whether the general public and the racing industry participants shared the same views.

Racing Industry Participants Survey 2018

Work commenced on the next Racing Industry Participants Survey, which will be conducted in 2019. The results will be presented in the 2018–19 Annual Report.

Stakeholder Survey 2019

The General Public Survey and Racing Industry Participants Survey provide the Commissioner with valuable information to gauge opinions and attitudes regarding integrity in racing. Along the same lines, ORIC has a focus on delivering advice and service to key stakeholders and a need to gauge the levels and quality of its work. To this end, the Commissioner has engaged an independent researcher to conduct a qualitative analysis of key stakeholder relationships. As well as providing impartial and confidential feedback from stakeholders on ORIC's performance, the information collected enables the Commissioner to target opportunities for improvement through the following year's business plan.

The survey focuses on rating the performance of ORIC against key performance indicators. The results are compared with previous surveys to assess areas of performance and perceived improvement or decline in these areas. Performance indicators include measures such as functional capability, relationship management and industry standing.

Due to the operational constraints and organisational restructures in each of the codes, the Stakeholder Survey has not been conducted since 2015. This survey will resume in March 2019.

Survey results comparison

Category	General Public Survey February 2018	General Public Survey February 2017	Racing Industry Survey June 2017
Attendance (Respondents who had attended a Thoroughbred, Harness or Greyhound race in Victoria in the past 12 months)	24%	24%	97%
Betting (Respondents who had placed a bet on a race in any of the three codes in the previous 12 months)	38%	38%	86%
Confidence (Respondents who had confidence in the integrity of the VRI)	47%	45%	71%
Integrity independence Management of the integrity of racing (Respondents who believe a separate integrity organisation should employ and manage people responsible for integrity in racing)	64%	63%	58%
Awareness of the Racing Integrity Commissioner	30%	26%	84%
Perceived changes in integrity (Respondents who believe that integrity in racing had improved in the past 12 months)	23%	22%	38%
Change in attitudes towards integrity as a result of media reporting (Respondents whose opinion about integrity had changed for the better)	11%	11%	16%
(Respondents whose opinion about integrity had changed for the worse)	29%	30%	30%
(Respondents whose attitudes had not changed)	31%	29%	50%
Media (Respondents who could recall a specific racing integrity related media story that led to their attitudes to integrity)	22%	21%	68%

RV, HRV and GRV continue to play the core role in integrity in their respective codes. Collectively, their initiatives shape and strengthen integrity throughout the VRI. Some of their key integrity initiatives in 2017–18 are outlined here.

Racing Victoria

- Required all licensed trainers to acknowledge and declare their obligations and responsibilities in respect to equine welfare as part of the online licence renewal system.
- Entered into a Memorandum of Understanding with the RSPCA to formalise the process of welfare related matters. This agreement will allow exchange of information between agencies, ensuring welfare matters are dealt with appropriately.
- Sponsored research groups to identify areas where it was possible to better protect the health, safety and welfare of horses and their jockeys, and improve training regimes and the management of horses.
- Extended mental health and wellbeing support to licensed industry participants and their immediate families by offering access to a free, independent psychological support service.
- Introduced the Trainer and Owner Reforms as part of a national system aimed at providing trainers and owners with a nationally recognised dispute resolution process. A newly formed Trainer Dispute Tribunal was established to determine matters within the scope of the Trainer and Owner Reforms.
- Restructured the Licensing Regulation Unit. The Intelligence and Compliance Unit continued to increase efficiencies in all aspects of licensing and compliance. This unit is working closely with Racing Australia to establish a complete online licensing system.
- Made jockey betting declarations part of the online licence renewal system. Declaration forms are required to be completed by all licensed jockeys via this system for each racing season.
- Continued to deliver educational seminars for veterinarians and trainers. The RV Veterinary Department held the 2nd Annual Veterinary Seminar at Moonee Valley in June 2018 and continues to deliver regional training seminars to country based trainers.
- The Integrity Services Department increased its surveillance capability with the installation of additional CCTV at Flemington Racecourse and continued to assist Racing Australia with the modernisation of the rules of racing.
- Improving integrity assurance through sampling and inspections, for example:
 - swab samples taken — 11,913 and 1,620 (out of competition tests)
 - positive results — 13 (equine) and 31 (human)
 - stable inspections — 1,607.

Harness Racing Victoria

- Increased drug testing at race meetings in the 2017–18 season. Post-race swabs increased by 100 per cent and human samples and 'out of competition' drug testing increased by 50 per cent.
- Developed a Stable Inspection Framework to assist both the licensed participants and the Integrity Department. The Integrity Department continued to proactively conduct surveillance and inspection efforts to prevent, deter and detect prohibited pre-race treatment of competing horses. The surveillance and inspections resulted in a number of pre-race treatment offences detected and successfully prosecuted.
- Streamlined the HRV RAD Board process. The new process involves licensed participants being provided with a limited brief of evidence at the time of laying charges, giving the licensed participant 14 days to provide a response on their intention to plead either guilty or not guilty.
- Appointed three full-time veterinarians to ensure more veterinarians are at race meetings. The HRV veterinarians were also extensively involved in the implementation of microchipping for all new foals in Victoria.
- Introduced post-race endoscopic examinations at Bendigo Harness Racing Club and Tabcorp Park, Melton, in February 2018, carried out by the HRV veterinarians.
- Expanded the Licensing Steward role to include animal welfare. This will assist the veterinarians in implementing and subsequently reviewing policies and procedures in the promotion of health and welfare of Standardbreds.
- Developed and introduced an Animal Welfare Training Module for all licensed participants for the 2019 season, in collaboration with the Bendigo Harness Racing Training Centre.
- Introduced the first edition of the *Integrity Matters* newsletter in February 2018. This publication is an initiative delivered via Trots Media to highlight the importance of integrity in harness racing.

Greyhound Racing Victoria

- Re-branded the Integrity Department at GRV as the Greyhound Racing Integrity Unit (GRIU) to recognise the level of independence required for the integrity function at GRV, which is in line with modern practice to build on the existing regulatory framework.
- Introduced a 'fit and proper person' requirement when assessing new applications for registration. This allows GRV to assess the suitability of applicants in line with the sports integrity and welfare priorities. Every applicant who is at least 18 years old must provide the Board with a National Police Certificate or provide consent for GRV to obtain this certificate on the applicant's behalf. Applicants are also required to make declarations regarding all racing related disciplinary action taken against them in any racing code and to proactively disclose any new disciplinary or criminal matters. All existing registered participants are also required to disclose any relevant disciplinary or criminal matters that occurred on or after 1 October 2017.
- Developed a new betting and racing model that detects and reports on suspicious performance or activity based on pre-determined indicators of risk. The model provides 'real time' analysis and forecasts predictions in support of the Investigations Unit and the Stewards panel.
- Moved its Animal Welfare Inspectorate, formerly based in the Animal Welfare Department, to the GRIU. The actual responsibilities of the Inspectorate remain unchanged while being more closely aligned with the work of integrity.
- Introduced a regional model for the Stewards panel, which includes a Deputy Chief Steward and four Senior Stewards who lead the panel.
- Implemented professional training for Stewards.
- Handled all matters relating to prosecutions and provided authoritative advice to Stewards and investigators through the Legal Services Unit within the GRIU.
- Continued to evolve its approach to regulation, using a more sophisticated risk-based model for activities. Betting and form analysts were incorporated into the GRIU, rules of racing changed to strengthen integrity and two new veterinarians were employed. The Suspicious Activity hotline and online portal continued to provide critical information for GRIU investigations, leading to a number of successful prosecutions.

GRIU	Greyhound Racing Integrity Unit
GRV	Greyhound Racing Victoria
HRV	Harness Racing Victoria
IR	Information Report
IBAC	Independent Broad-based Anti-corruption Commission
ICF	Integrity Council Forum
ORIC	Office of the Racing Integrity Commissioner
RADB	Racing Appeals and Disciplinary Board
RASL	Racing Analytical Services Limited
RSPCA	Royal Society for the Prevention of Cruelty to Animals
RIOC	Racing Integrity Operations Committee
RV	Racing Victoria
SCOP	Single Code of Practice
VRI	Victorian Racing Industry

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